

IN THE COURT OF CRIMINAL APPEALS
OF TEXAS

MARKERRION ALLISON

§
§
§
§

VS.

THE STATE OF TEXAS

CASE NO. PD-0905-21

FILED
COURT OF CRIMINAL APPEALS
4/19/2022
DEANA WILLIAMSON, CLERK

APPELLANT'S MOTION FOR LEAVE TO FILE OUT-OF-TIME BRIEF

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW, Respondent-Appellant MARKERRION D'SHON ALLISON, by and through the undersigned counsel, and tenders this motion for leave to file out-of-time brief. In support of this motion, Appellant would show the following:

Respondent-Appellant's Brief was due Monday, April 11, 2022. However, due to unforeseen circumstances, the undersigned counsel was not able to electronically file the Brief until after 12:00 a.m. on April 12, 2022. Appellant respectfully seeks leave of the Court to file this out-of-time brief.

This motion is not made for purposes of delay, but in the interest of justice, and to meet the undersigned counsel's obligations to her client and this Court, and to accomplish the design of this appeal, which is to do substantial justice.

Respectfully submitted,

Gena Bunn

GENA BUNN

Texas Bar No. 00790323

Gena Bunn, PLLC

P.O. Box 6150

Longview, Texas 75608

(903) 804-4003

gbunn@genabunnlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been delivered by electronic mail or certified electronic service provider to counsel for the State, Brendan Guy, on this the 12th day of April, 2022. The document has also been served electronically through the electronic file manager pursuant to Rule 9.5 of the Texas Rules of Appellate Procedure.

Gena Bunn

GENA BUNN

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Gena Bunn on behalf of Gena Bunn
Bar No. 790323
gbunn@genabunnlaw.com
Envelope ID: 63475661
Status as of 4/19/2022 3:39 PM CST

Associated Case Party: MarkerrionD'ShonAllison

Name	BarNumber	Email	TimestampSubmitted	Status
Gena Bunn		gbunn@genabunnlaw.com	4/12/2022 5:57:32 AM	SENT

Associated Case Party: Gregg County Criminal District Attorney's Office

Name	BarNumber	Email	TimestampSubmitted	Status
Brendan Guy		Brendan.Guy@co.gregg.tx.us	4/12/2022 5:57:32 AM	SENT